

HON. JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JUDITH HANCOCK,

Plaintiff

v.

AETNA LIFE INSURANCE
COMPANY; THE BOEING COMPANY
EMPLOYEE HEALTH AND WELFARE
BENEFIT PLAN (PLAN 503); and
EMPLOYEE BENEFIT PLANS
COMMITTEE,

Defendants.

Case No. 2:16-cv-01697-JLR

AGREED MOTION AND [REDACTED]
ORDER REGARDING USE OF MODEL
STIPULATED PROTECTIVE ORDER WITH
SLIGHT MODIFICATIONS

NOTED ON MOTION CALENDAR:

May 25, 2017

AGREED MOTION

The parties, through their undersigned counsel of record, jointly move this Court to enter the Protective Order attached hereto as Dkt. No. 57-1.

The Protective Order is based on the Western District of Washington's Model Stipulated Protective Order. It has been signed by Plaintiff's counsel and by counsel for Professional Disability Associates, LLC ("PDA"), and concerns documents to be produced by PDA in

**AGREED MOTION AND PROPOSED ORDER RE:
USE OF MODEL PROTECTIVE ORDER - 1**

No. 2:16-cv-01697-JLR

LAW OFFICE OF MEL CRAWFORD
9425 35th Avenue N.E., Suite C
Seattle, Washington 98115
Tel 206.694-1614 Fax 206.905-2342

1 response to a subpoena duces tecum Plaintiff served on that business. (That subpoena is Dkt.
2 No. 29-5 in this action.) The Order has been modified slightly to reflect that it is an agreement
3 between Plaintiff and a non-party, rather than a party to this action. A redlined copy showing the
4 modifications is attached hereto as Dkt. No. 57-2. Counsel for the parties to this action discussed
5 this matter during an LR 37(a) conference on May 5, 2017
6

7 Respectfully submitted this 25th day of May, 2017.

8 LAW OFFICE OF MEL CRAWFORD

9 By s/Mel Crawford

10 Mel Crawford, WSBA # 22930
melcrawford@melcrawfordlaw.com

11 Attorney for Plaintiff

12 GORDON & REES, LLP

13 By s/Sarah Turner

14 Sarah Turner, WSBA #37748
Brittany Stevens, WSBA #44822
sturner@gordonrees.com
bstevens@gordonrees.com

15 Attorneys for Defendants

17 II. ORDER

19 Pursuant to the parties' agreed motion, it is so ORDERED. Plaintiff may file the
20 Stipulated Protective Order as that document appears at Dkt. No. 56-1.

21 Dated this 24 day of May, 2017.

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24
25 James L. Robart
United States District Judge

26
27 AGREED MOTION AND PROPOSED ORDER RE:
USE OF MODEL PROTECTIVE ORDER - 2

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CERTIFICATE OF SERVICE

I certify that on the date noted below I electronically filed this document entitled
AGREED MOTION AND PROPOSED ORDER REGARDING USE OF MODEL
STIPULATED PROTECTIVE ORDER WITH SLIGHT MODIFICATIONS with the Clerk of
the Court using the CM/ECF system which will send notification of such filing to the following
persons:

Attorneys for Defendants:

Sarah N. Turner
sturner@gordonrees.com
Brittany F. Stevens
bstevens@gordonrees.com
Gordon & Rees LLP
701 5th Avenue, Suite 2100
Seattle, WA 98104

DATED this 25th day of May, 2017 at Seattle, Washington.

s/Mel Crawford
Mel Crawford

**AGREED MOTION AND PROPOSED ORDER RE:
USE OF MODEL PROTECTIVE ORDER - 3**

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